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January 6, 2021

The Honorable Joseph A. Dickson  
United States Magistrate Judge  
King Fed. Bldg. & United States Courthouse  
50 Walnut St., P.O. Box 999  
Newark, New Jersey 07101-0999

**Re: White, et al. v. Samsung Electronics America, Inc., et al.,**  
**Case No. 17-1775 (MCA)(JAD)**  
**Extension of Time Concerning Briefing Schedule**

Dear Honorable Judge Dickson:

As set forth in my previous letter to the Court dated December 7, 2020, my ongoing and extraordinarily-painful medical issues have prevented me from performing my duties as a practicing attorney. (In fact, I just finished a stay at Cornell Hospital in Manhattan in an attempt for the doctors there to diagnose my serious medical condition.) Since, as the Court is aware, I am the primary attorney responding to Defendants' current arbitration / class waiver motions, I had respectfully requested from Your Honor additional time on behalf of Plaintiffs to respond to Defendants' motions to compel arbitration / class-action waiver until *March 30, 2021*.

In our previous Court conference with all the parties, you had indicated that if my medical condition required additional time for me on behalf of Plaintiffs to respond to Defendants' arbitration / class waiver motions, the Court would be amenable to such a request by me.

Respectfully, I ask the Court to order that the time for Plaintiffs to respond to Defendants' motions to compel arbitration / class-action waiver be set to *March 31, 2021*. I also hold out to the Court that this will be the final extension-of-time request by Plaintiffs related to Defendants' motions to compel arbitration /

class-action waiver.

Respectfully,

/s/ Mack Press

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Counsel for Plaintiffs

Cc: all parties via ECF